



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JEFFREY L. ANSON,	)	Case No. 8:07cv0322
	)	
Plaintiff,	)	
	)	
vs.	)	JOINT STIPULATION
	)	<u>AND PROTECTIVE ORDER</u>
H.E.L.P. FOUNDATION OF	)	
OMAHA, INC.,	)	
	)	
Defendant.	)	

IT IS HEREBY STIPULATED and agreed among the undersigned attorneys as follows:

1. The Plaintiff has issued a subpoena to the Nebraska Workforce Development, Department of Labor, for certain records of the Department maintained with regard to the Rani Sati Corporation.
2. The Department has objected to production of the records without a Court order pursuant to Neb. Rev. Stat. §48-612 and §48-612.01.
3. The parties agree that, subject to approval of this Stipulation by the Court, such records shall be produced by the Department to counsel for the Plaintiff and the Defendant in this action, and shall be held in strict confidence by counsel for the parties. The Department shall redact the social security numbers of any individuals other than Jeffrey L. Anson. The records shall be shown only to the parties, personnel in the parties' counsel's office assisting in the preparation of this case for trial, and to any experts engaged by or on behalf of the parties. Such documents shall be used solely for purposes of this action, and all copies shall be returned to counsel for

the Department, or destroyed, at the conclusion of this litigation.

JEFFREY L. ANSON, Plaintiff

By: /s/ Thomas P. Hoarty, Jr.  
Thomas P. Hoarty, Jr. #16807  
BYAM & HOARTY  
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8990 West Dodge Road  
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(402) 397-0303  
Attorneys for Plaintiff

AND

E.B.L.F. FOUNDATION OF OMAHA,  
INC., Defendant

By: [Signature]  
MCGRATH NORTH LAW FIRM  
1801 Dodge Street  
Suite 1700  
Omaha, NE 68102  
(402) 341-3070  
Attorneys for Defendant

APPROVED:

~~Nebraska Workforce Development~~  
Department of Labor

By: [Signature]  
John M. Tabin  
P.O. Box 94600  
Lincoln, NE 68509-4600

IT IS SO ORDERED:

1/17/08  
Date

[Signature]  
United States Magistrate Judge